

RE: CWS Bankruptcy - Subpoena to Appear and Testify at a Hearing or Trial in a Bankruptcy Case - Israel Rodriguez**Butch Boyd** <butchboyd@butchboydlawfirm.com>

Wed 9/4/2024 10:13 AM

To: 'Watts, Jameson' <Jameson.Watts@huschblackwell.com>

Cc: Shelby Jordan <sjordan@jhwclaw.com>; Chrystal Madden <cmadden@jhwclaw.com>; Katrina Boyd <katrinaboyd@Butchboydlawfirm.com>

Jameson,

Thanks for the heads up. I am empathetic to anyone's medical issues. I can not agree, however, to keep the hearing open to the 19th. The Judge made it clear he wants this wrapped up. I am assuming not a medical emergency or he would not be waiting several weeks for consult. I will expect him to be at the hearing on the 17th as subpoenaed.

Alternatively, if you will agree to tender him for deposition in San Antonio next week, and will agree to stipulate as to his unavailability if he is in surgery on the 17th and stipulate to the use of the deposition testimony at the hearing, we could go that route.

Let me know.

Best,

butch

From: Watts, Jameson <Jameson.Watts@huschblackwell.com>**Sent:** Tuesday, September 3, 2024 4:55 PM**To:** Butch Boyd <butchboyd@butchboydlawfirm.com>**Subject:** RE: CWS Bankruptcy - Subpoena to Appear and Testify at a Hearing or Trial in a Bankruptcy Case - Israel Rodriguez

Butch,

I've spoken to Israel a few times over the past week or two. He has a surgery consult for his broken arm on Monday, September 16th, that has been on the books for a while. He's been told that if the doctor decides to operate, the surgery will be on either September 17th or 18th. I asked that he push for the afternoon of the 17th or on the 18th if he has to get the surgery, with the hope that you'd call him first on the 17th so he can get out for his surgery if needed. He's called the doctor's office several times to see if they can commit to later in the day on the 17th or on the 18th, but the doctor hasn't given him an answer yet. His surgery consult is in San Antonio on the 16th, so he'll be in town and available so long as the doctor doesn't schedule him for the morning of the 17th. I think the worst-case scenario would be to have the hearing on the 17th kept open and to allow him to testify on the 19th. I assume 48 hours is enough recovery time to allow him to get into the courthouse to testify.

Thanks,
Jameson**Jameson J. Watts****Partner**

Direct: 512.479.1179

Trustee Exhibit**3**

Adversary 24-05011

Cell: 512.633.6319

Jameson.Watts@huschblackwell.com



From: Butch Boyd <butchboyd@butchboydlawfirm.com>

Sent: Monday, August 12, 2024 9:40 PM

To: Watts, Jameson <Jameson.Watts@huschblackwell.com>

Subject: Re: CWS Bankruptcy - Subpoena to Appear and Testify at a Hearing or Trial in a Bankruptcy Case - Israel Rodriguez

[EXTERNAL EMAIL]

He is available he does what he is told by shumate and pollard

On Aug 12, 2024, at 7:20 PM, Watts, Jameson
<Jameson.Watts@huschblackwell.com> wrote:

No clue if he's available on such short notice, but I'll check.

Thanks,
Jameson

Jameson J. Watts

Partner

Direct: 512.479.1179

Cell: 512.633.6319

Jameson.Watts@huschblackwell.com

<image001.jpg>

From: Butch Boyd <butchboyd@butchboydlawfirm.com>

Sent: Monday, August 12, 2024 6:55 PM

To: Watts, Jameson <Jameson.Watts@huschblackwell.com>

Subject: Re: CWS Bankruptcy - Subpoena to Appear and Testify at a Hearing or Trial in a Bankruptcy Case - Israel Rodriguez

[EXTERNAL EMAIL]

Serving you as lawyer for his employer. Let me know if he will not be showing up for the hearing

On Aug 12, 2024, at 4:47 PM, Watts, Jameson
<Jameson.Watts@huschblackwell.com> wrote:

Thanks, Butch. Is this my notice of the subpoena or are you want me to do something with it?

Thanks,
Jameson

Jameson J. Watts

Partner

Direct: 512.479.1179

Cell: 512.633.6319

Jameson.Watts@huschblackwell.com

<image001.jpg>

From: Butch Boyd <butchboyd@butchboydlawfirm.com>

Sent: Saturday, August 10, 2024 2:07 PM

To: Watts, Jameson <Jameson.Watts@huschblackwell.com>

Subject: Fwd: CWS Bankruptcy - Subpoena to Appear and Testify at a Hearing or Trial in a Bankruptcy Case - Israel Rodriguez

[EXTERNAL EMAIL]

Please see attached

Begin forwarded message:

From: Katrina Boyd <katrinaboyd@butchboydlawfirm.com>

Date: August 10, 2024 at 12:53:13 PM CDT

To: Butch Boyd <butchboyd@butchboydlawfirm.com>

Subject: CWS Bankruptcy - Subpoena to Appear and Testify at a Hearing or Trial in a Bankruptcy Case - Israel Rodriguez